



**DEREK SMITH**  
LAW GROUP, PLLC  
Employment Lawyers Representing Employees Exclusively

November 16, 2021

**Via ECF**

Hon. Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Figueroa v. ZZ LASHES INC. et al.*  
Case No: 1:20-cv-04382

Dear Judge McMahon:

This firm represents Plaintiff in the above case. Plaintiff respectfully requests a stay of this action pending final execution of the settlement and dismissal with prejudice, or alternatively, leave to file a non-joint Proposed Pretrial Order. The parties have recently agreed to a settlement, and a final settlement agreement with terms that all parties have agreed to has been sent to Defendant Oberoi for his execution. We anticipate having the fully executed settlement agreement shortly and stipulating to dismiss with action with prejudice within the next few months. Moreover, we sent Defendant Oberoi a draft of the attached Proposed Joint Pre-Trial Order for his edits over forty (40) days ago, and we have been attempting to receive Defendant Oberoi's edits regarding the attached Proposed Joint Pretrial Order since that time, repeatedly following up with him. We have not received his edits to date.

In light of the above, Plaintiff respectfully requests a stay of this action pending final execution of the settlement and dismissal with prejudice, or alternatively, leave to file the non-joint Proposed Pretrial Order as attached.

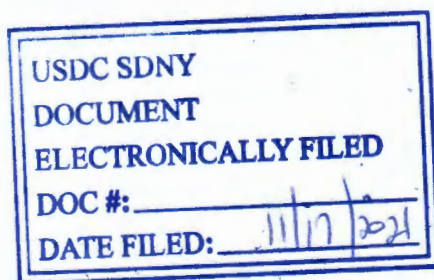
I thank the Court for its time and attention to this matter.

Respectfully submitted,  
/s/ Ishan Dave

**DEREK SMITH LAW GROUP, PLLC**  
ISHAN DAVE

*Ishan@dereksmithlaw.com*  
1 Penn Plaza, Suite 4905  
New York, New York 10119  
Phone: (212) 587-0760

MEMO ENDORSED



CC: All Counsel of Record (Via ECF)

NYC Office: One Pennsylvania Plaza, Suite 4905, New York, NY 10119 | (212) 587-0760  
Philadelphia Office: 1845 Walnut Street, Suite 1600, Philadelphia, PA 19103 | (215) 391-4790  
NJ Office: 73 Forest Lake Drive, West Milford, NJ 07421 | (973) 388-8625  
Miami Office: 100 SE 2<sup>nd</sup> Street, Suite 2000, Miami, FL, 33131 | (305) 946-1884